John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

12/12/2014

Genevieve Damico *Via E-Mail Notification*
United States Environmental Protection Agency
Mail Code: AR-18J
77 West Jackson Blvd.
Chicago, IL 60604-3507

RE: PROPOSED AIR POLLUTION TITLE V PERMIT
Facility Name: Okamoto Sandusky Manufacturing LLC
Facility ID: 0322020019
Permit Type: Renewal
Permit Number: P0117364

Dear Ms. Damico:

A proposed OAC Chapter 3745-77 Title V permit for the referenced facility has been issued for review by U.S. EPA. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. If U.S. EPA does not object to this proposed permit, the permit will be processed for issuance as a final action not less than 45 days from the date of this letter. Please contact me at (614) 644-2835 by the end of the 45 day review period if you wish to object to the proposed permit.

Sincerely,

Erica R. Engel-Ishida, Manager
Permit Issuance and Data Management Section, DAPC

Cc: Ohio EPA DAPC, Northwest District Office

PROPOSED

Division of Air Pollution Control
Title V Permit
for
Okamoto Sandusky Manufacturing LLC

Facility ID:	0322020019
Permit Number:	P0117364
Permit Type:	Renewal
Issued:	12/12/2014
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Division of Air Pollution Control
Title V Permit
for
Okamoto Sandusky Manufacturing LLC

Table of Contents

Authorization 1
A. Standard Terms and Conditions 2
1. Federally Enforceable Standard Terms and Conditions 3
2. Monitoring and Related Record Keeping and Reporting Requirements 3
3. Reporting of Any Exceedence of a Federally Enforceable Emission Limitation or Control Requirement Resulting From Scheduled Maintenance 6
4. Risk Management Plans 7
5. Title IV Provisions 7
6. Severability Clause 7
7. General Requirements 7
8. Fees 8
9. Marketable Permit Programs 8
10. Reasonably Anticipated Operating Scenarios 9
11. Reopening for Cause 9
12. Federal and State Enforceability 9
13. Compliance Requirements 9
14. Permit Shield 11
15. Operational Flexibility 11
16. Emergencies 11
17. Off-Permit Changes 12
18. Compliance Method Requirements 12
19. Insignificant Activities or Emissions Levels 13
20. Permit to Install Requirement 13
21. Air Pollution Nuisance 13
22. Permanent Shutdown of an Emissions Unit 13
23. Title VI Provisions 13
24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only 14
25. Records Retention Requirements Under State Law Only 14
26. Inspections and Information Requests 14
27. Scheduled Maintenance/Malfunction Reporting For State-Only Requirements 15
28. Permit Transfers 15

29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations 15
30. Submitting Documents Required by this Permit 16
B. Facility-Wide Terms and Conditions 17
C. Emissions Unit Terms and Conditions 20
1. P010, Ink Mixing 21
2. P028, Calendering Line 22
3. P029, Expansion Line 27
4. Emissions Unit Group - Laminator/Embosser: P030 and P031 36
5. Emissions Unit Group - Rotogravure Printers: K003 and K004 52

Authorization

Facility ID:	0322020019
Facility Description:	The company produces vinyl products for the automotive industry.
Application Number(s):	A0048977, A0051080
Permit Number:	P0117364
Permit Description:	Title V renewal permit for manufacturer of vinyl products for the automotive industry.
Permit Type:	Renewal
Issue Date:	12/12/2014
Effective Date:	To be entered upon final issuance
Expiration Date:	To be entered upon final issuance
Superseded Permit Number:	P0110841

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

Okamoto Sandusky Manufacturing LLC
3130 West Monroe Street
Sandusky, OH 44870

Ohio Environmental Protection Agency (EPA)District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419)352-8461

The above named entity is hereby granted a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Ohio EPA DAPC, Northwest District Office. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months and no later than 6 months prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:

(1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions

(2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions

(3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting For State-Only Requirements

(4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(5) Standard Term and Condition A. 30.

(Authority for term: ORC 3704.036(A))

2. Monitoring and Related Record Keeping and Reporting Requirements

a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

(1) The date, place (as defined in the permit), and time of sampling or measurements.

(2) The date(s) analyses were performed.

(3) The company or entity that performed the analyses.

(4) The analytical techniques or methods used.

(5) The results of such analyses.

(6) The operating conditions existing at the time of sampling or measurement.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordingsfor continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))

c) The permittee shall submit required reports in the following manner:

(1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any submittedscheduled maintenancerequests, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

(2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be submitted promptly to the Ohio EPA DAPC, Northwest District Office. Except as provided below, the written reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

(3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted to the Ohio EPA DAPC, Northwest District Office by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from

federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))

(4) Each written report shall be signed by a Responsible Official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete." Signature by the Responsible Official may be represented by entry of the personal identification number (PIN) by the Responsible Official as part of the electronic submission process or by the scanned attestation document signed by the Responsible Official that is attached to the electronically submitted written report.

(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

(5) Consistent with A.2.c.1. above, reports of any required monitoring and/or record keeping information required to be submitted to Ohio EPA shall be submitted to Ohio EPA DAPC, Northwest District Office unless otherwise specified.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. Reporting of Any Exceedence of a Federally Enforceable Emission Limitation or Control Requirement Resulting From Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

4. Risk Management Plans

If applicable, the permittee shall develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. § 7401 et seq. ("Act"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or

b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

(Authority for term: OAC rule 3745-77-07(A)(4))

5. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

(Authority for term: OAC rule 3745-77-07(A)(5))

6. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

(Authority for term: OAC rule 3745-77-07(A)(6))

7. General Requirements

a) Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permitexcept as provided pursuant to A.16 below.

c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.11 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d) This permit does not convey any property rights of any sort, or any exclusive privilege.

e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:

(1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or

(2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or

(3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminant sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))

8. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

(Authority for term: OAC rule 3745-77-07(A)(8))

9. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

(Authority for term: OAC rule 3745-77-07(A)(9))

10. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.

(Authority for term: OAC rule 3745-77-07(A)(10))

11. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

12. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

(Authority for term: OAC rule 3745-77-07(B))

13. Compliance Requirements

a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a Responsible

Officialthat, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

(1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

(2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.

(3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

(4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c) The permittee shall submit progress reports to the Ohio EPA DAPC, Northwest District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

(1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

(2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the Ohio EPA DAPC, Northwest District Office) and the Administrator of the U.S. EPA in the following manner and with the following content:

(1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.

(2) Compliance certifications shall include the following:

a. Identification of each term or condition that is the basis of the certification. The identification may include a statement by the Responsible Official that every term and condition that is federally enforceable has been reviewed, and such terms and conditions with which there has been continuous compliance throughout the year are not separately identified.

b. The permittee's current compliance status.

c. Whether compliance was continuous or intermittentconsistent with A.13.d.2.a above.

d. The method(s) used for determining the compliance status of the source currently and over the required reporting period consistent with A.13.d.2.a above.

e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

(3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

14. Permit Shield

a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

(Authority for term: OAC rule 3745-77-07(F))

15. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the Ohio EPA DAPC, Northwest District Office with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the Ohio EPA DAPC, Northwest District Office as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

16. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met.

This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

(Authority for term: OAC rule 3745-77-07(G))

17. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.

b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.

c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).

d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.

e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit-to-install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(Authority for term: OAC rule 3745-77-07(I))

18. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Federal Register 8314, Feb. 24, 1997), in the context of any future proceeding.

(This term is provided for informational purposes only.)

19. Insignificant Activities or Emissions Levels

Each IEU that is subject to one or more applicable requirements shall comply with those applicable requirements.

(Authority for term: OAC rule 3745-77-07(A)(1))

20. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-07(A)(1))

21. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

(Authority for term: OAC rule 3745-77-07(A)(1))

22. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the Responsible Official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the Responsible Official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

Unless otherwise exempted, noemissions unit identified in this permit that has beencertified by the Responsible Official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-01)

23. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

a) Persons operating appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.

b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.

c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(Authority for term: OAC rule 3745-77-01(H)(11)))

24. Reporting Requirements Related to Monitoring and Record Keeping RequirementsUnder State Law Only

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or record keeping information shall be submitted to theOhio EPA DAPC, Northwest District Office.

b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Northwest District Office. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

25. Records Retention RequirementsUnder State Law Only

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

26. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine

whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

(Authority for term: OAC rule 3745-77-07(C))

27. Scheduled Maintenance/Malfunction Reporting For State-Only Requirements

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Northwest District Office in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

28. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Ohio EPA DAPC, Northwest District Office must be notified in writing of any transfer of this permit.

(Authority for term: OAC rule 3745-77-01(C))

29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or

b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potential to emit; or

c) where the company's Responsible Official has certified that an emissions unit has been permanently shut down.

30. Submitting Documents Required by this Permit

All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event ofan alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the Ohio EPA DAPC, Northwest District Office, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the Responsible Official may be represented as provided through procedures established in Air Services.

B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

   a) None.

2. The following insignificant emissions units located at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within the identified permit-to-install for the emissions unit. The insignificant emissions units listed below are subject to one or more applicable requirement contained in a permit-to-install, or in the SIP-approved versions of OAC Chapters 3745-17, 3745-18, and 3745-21, and 3745-31:

EU ID	Operations, Property and/or Equipment Description
B002	Two, 8.0 mmBtu/hr natural gas fired hydrotherm oil heaters
B003	Two, air make up units (HV4 – 7.92 mmBtu/hr and HV5 – 7.04 mmBtu/hr)
B010	6.8 mmBtu/hr natural gas fired boiler (Bryan Boiler #1)
B013	6.3 mmBtu/hr natural gas fired boiler (Bryan Boiler #3)
L001	Maintenance cold solvent parts washer
L002	Tooling area cold solvent parts washer #1
P013	R&D Lab Vinyl Sheeting Calender
P032	Vinyl Sheet Laminator/Embosser #4
P033	Cummins Emergency Fire Pump Diesel Engine, 220 HP, (PBR11585)

   [OAC rule 3745-77-07(A)(13)]

3. The following emissions unit located at this facility is subject to all applicable requirements as outlined in OAC rule 3745-31-03(A)(4)(b):

EU ID	Operations, Property and/or Equipment Description
P033	Cummins Emergency Fire Pump Diesel Engine, 220 HP, (PBR11585)

   [OAC rule 3745-77-07(A)(13)]

4. The permittee is subject to the applicable emission limitation(s) and/or control measures, operational restrictions, monitoring and/or record keeping requirements, reporting requirements, testing requirements and the general and/or other requirements specified in 40 CFR Part 63, Subpart DDDDD, in accordance with 40 CFR Parts 63.7480 through 63.7575 [including the Table(s) and appendix(ices) referenced in Subpart DDDDD]. The following insignificant emissions units in this permit are subject to the aforementioned requirements:

EU ID	Operations, Property and/or Equipment Description
B002	Two, 8.0 mmBtu/hr natural gas-fired hydrotherm oil heaters
B010	6.8 mmBtu/hr natural gas fired boiler (Bryan Boiler #1)
B013	6.3mmBtu/hr natural gas fired boiler (Bryan Boiler #3)

   The permittee shall comply with the applicable provisions of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters, as promulgated by the United States Environmental Protection Agency under 40 CFR Part 63, Subpart DDDDD. The final rules found in 40 CFR Part 63, Subpart DDDDD establish national emission standards for hazardous air pollutants (NESHAP), operational limits, work practice standards, and

compliance requirements for industrial, commercial, and institutional boilers located at a major source of hazardous air pollutants (HAP). The permittee shall comply with the requirements and limits of this NESHAP for the facility's new (commenced construction after 6/4/10) boilers by January 31, 2013, or upon startup, whichever is later. The permittee shall also comply with all applicable requirements of 40 CFR Part 63, Subpart A (General Provisions) as identified in Table 10 of 40 CFR Part 63, Subpart DDDDD. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website http://ecfr.gpoaccess.gov or by contacting the appropriate Ohio EPA District office or local air agency.

The terms in this permit identify the requirements of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) contained in 40 CFR Part 63, Subpart DDDDD and are meant to help the permittee maintain compliance with this NESHAP. The requirements of this Subpart apply to the facility's boilers and process heaters according to their applicable subcategory, as identified in 40 CFR 63.7499 and as defined in 40 CFR 63.7575.

a) The boilers identified above are designed to only burn gas 1 fuels (subcategory) and therefore is/are not subject to the emission limits in Tables 1 and 2, or 11 through 13 of the subpart or the operating limits in Table 4 to the subpart. However, the boiler(s) is/are subject to tune-ups requirements, conducted in accordance with 40 CFR 63.7540(a)(10)(i) through (vi) and Table 3 to the subpart.

[OAC rule 3745-77-07(A)(13) and 40 CFR Part 63, Subpart DDDDD]

5. The existing emergency compression ignition (CI) reciprocating internal combustion engine (RICE), located at an area source for Hazardous Air Pollutants (HAPs), is subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines, Part 63, Subpart ZZZZ. The existing stationary CI RICE, EU# P033 installed before 6/12/06, shall meet the requirements of 63, Subpart ZZZZ no later than 5/3/13.

The RICE must meet the definition of an emergency stationary RICE in section 63.6675, which includes operating according to the provisions specified in section 63.6640(f), and the permittee shall meet the following requirements contained in 40 CFR, Part 63, Subpart ZZZZ:

66.6605(a) & (b)	General Compliance
63.6603(a), 63.6625(e), (f), (h), and (i)	Monitoring, Installation, Collection, Operation, & Maintenance
66.6640 (a),and (f)	Continuous Compliance
63.6655(d), (e) &(f) & 63.6660(a), (b), and (c)	Recordkeeping
66.6640(b) and (e)	Reporting
66.6665	Table 8 General Provisions

[OAC rule 3745-77-07(A)(13), 40 CFR Part 60 Subpart IIII and 40 CFR Part 63, Subpart ZZZZ]

C. Emissions Unit Terms and Conditions

1. P010, Ink Mixing

Operations, Property and/or Equipment Description:

Ink Mixing

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-21-07(M)(3)(a)(iv)	See b)(2)a.

(2) Additional Terms and Conditions

a. OAC rule 3745-21-07(M)(2) is not applicable pursuant to OAC rule 3745-21-07(M)(3)(a) because this emissions unit does not meet all the specified requirements.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) None.

e) Reporting Requirements

(1) None.

f) Testing Requirements

(1) None.

g) Miscellaneous Requirements

(1) None.

2. P028, Calendering Line

Operations, Property and/or Equipment Description:

Calendaring Line – dry materials handling and blending operations, and heated rolling and calendaring operations

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	ORC 3704.03(T)	See b)(2)a.
b.	OAC rule 3745-31-05(D) [PTI# P0110842 issued 12/3/12]	0.009 grain particulate matter 10 microns or less (PM10) per dry standard cubic foot (dscf) and 0.79 ton PM10 per year, from Banbury mixing operations Visible particulate emissions (PE) shall not exceed 0% opacity, as a 6-minute average, from Banbury mixing operations. 4.42 pounds of particulate matter 10 microns or less in size (PM10) per hour and 19.35 tons of PM10 per year from the heated rolling and calendering operations 4.42 pounds of volatile organic compounds (VOC) per hour and 19.35 tons of VOC per year from the Banbury mixing operations and the heated rolling and calendering operations Visible PE shall not exceed 10% opacity, as a 6-minute average from the heated rolling and calendering operations See b)(2)b., b)(2)c., b)(2)d., and c)(1).
c.	OAC rule 3745-17-11(B)	See b)(2)e.
d.	OAC rule 3745-17-07(A)	See b)(2)f.

(2) Additional Terms and Conditions

a. The "Best Available Technology" (BAT) requirements under ORC 3704.03(T) have been determined to be the compliance with OAC rule 3745-31-05(D).

b. This permit establishes the following federally enforceable emission limitations for the purpose of limiting potential to emit (PTE) to avoid Prevention of Significant Deterioration (PSD) requirements. The federally enforceable emission limitations are based on the operational restrictions contained in c)(1) which require control equipment:

i. 0.009 grain PM10/dscf and 0.79 ton PM10/year from Banbury mixing operations;

ii. Visible PE shall not exceed 0% opacity, as a 6-minute average, from Banbury mixing operations;

iii. 4.42 lbs of PM10/hr and 19.35 tons of PM10/year from the heated rolling and calendaring operations;

iv. 4.42 lbs of VOC/hr and 19.35 tons of VOC/yr from the Banbury mixing operations and the heated rolling and calendaring operations; and

v. Visible PE shall not exceed 10% opacity, as a six-minute average from the heated rolling and calendaring operations.

c. The Banbury mixing operations are controlled by a mist eliminator followed by a two-stage fabric filter that vents inside the building. Therefore, the visible PE limitation of 0% opacity as a 6-minute average shall apply to emissions from the building egress points associated with the Banbury mixing operations.

d. All PE is considered to be PM10.

e. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(D).

f. The visible emission limitation specified by this rule is less stringent than the visible emission limitation established pursuant to OAC rule 3745-31-05(D).

c) Operational Restrictions

(1) The following operational restrictions have been included in this permit for the purpose of establishing federally enforceable requirements which limit potential to emit [See b)(2)b.]:

a. use of a mist eliminator followed by a two-stage fabric filter to control PE from the Banbury mixing operations.

[OAC rule 3745-77-07(A)(1) and PTI #P0110842]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stacks serving the heated rolling and calendering operations. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;

b. the total duration of any visible emissions incident; and

c. any corrective actions taken to eliminate the visible emissions.

[OAC rule 3745-77-07(C)(1) and PTI #P0110842]

(2) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions associated with the Banbury mixing operation and from the building serving the Banbury mixing operation. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the location and color of the emissions;

b. the total duration of any visible emissions incident; and

c. any corrective actions taken to eliminate the visible emissions.

[OAC rule 3745-77-07(C)(1) and PTI #P0110842]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. identify all days during which any visible particulate emissions were observed from the stacks serving the heated rolling and calendering operations, and/or emissions associated with the Banbury mixing operations from the building serving this emissions unit, and

b. describe any corrective actions taken to eliminate the visible particulate emissions.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #P0110842]

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitations:

0.009 grain PM10 per dscf and 0.79 ton PM10 per year, from Banbury mixing operations

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the grain loading by emissions testing in accordance with Methods 1 through 4 of 40 CFR Part 60, Appendix A and Methods 201, 201A and 202 of 40 CFR, Part 51, Appendix M. Alternative U.S.EPA approved test methods may be used with prior approval from the Ohio EPA Northwest District Office.

The annual limitation was developed by multiplying the grain loading of 0.009 gr/dscf by a maximum air flow of 2,300 cfm and 60 minutes/hour, dividing by 7000 gr/pound, and by multiplying by a maximum operating schedule of 8760 hours/year and dividing by a conversion factor of 2000 pounds/ton. Therefore, provided compliance is shown with the gr/dscf limitation, compliance with the annual limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI #P0110842]

b. Emission Limitation:

Visible PE shall not exceed 0% opacity, as a 6-minute average, from Banbury mixing operations.

Applicable Compliance Method:

If required, compliance with the visible emission limitation shall be determined in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1) and PTI #P0110842]

c. Emission Limitations:

4.42 pounds PM10 per hour and 19.35 tons PM10 per year from the heated rolling and calendering operations.

Applicable Compliance Method:

Compliance with the hourly limitation shall be demonstrated by multiplying the facility emission factor of 0.005 pounds of PE (all PE are considered to be PM10) per pound of plasticizer by the maximum process weight rate of 883.43 pounds of plasticizer processed per hour.

If required, the permittee shall demonstrate compliance with hourly limitation in accordance with Methods 1-4 of 40 CFR, Part 60, Appendix A and Methods 201, 201A and 202 of 40 CFR, Part 51, Appendix M.

The annual limitation was developed by multiplying the lbs/hr emission limitation by a maximum annual operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with hourly emission limitation, compliance with the annual limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI #P0110842]

d. Emission Limitations:

4.42 pounds of VOC per hour and 19.35 tons of VOC per year from the Banbury mixing operations and the heated rolling and calendering operations.

Applicable Compliance Method:

Compliance with the hourly limitation shall be demonstrated by multiplying the facility emission factor of 0.005 pounds of VOC per pound of plasticizer by the maximum process weight rate of 883.43 pounds of plasticizer processed per hour.

If required, the permittee shall demonstrate compliance with hourly limitation in accordance with Methods 1-4, and 18, 25 or 25A of 40 CFR, Part 60, Appendix A.

The annual limitation was developed by multiplying the lbs/hr emission limitation by a maximum annual operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with hourly emission limitation, compliance with the annual limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI #P0110842]

e. Emission Limitation:

Visible PE shall not exceed 10% opacity, as a 6-minute average from heated rolling and calendering operations.

Applicable Compliance Method:

If required, compliance with the visible emission limitation shall be determined in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1) and PTI #P0110842]

g) Miscellaneous Requirements

(1) None.

3. P029, Expansion Line

Operations, Property and/or Equipment Description:

Expansion Line

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D) [PTI #P0115007 issued 9/10/13]	Plastic film heating: 0.43 pound of particulate matter 10 microns or less in size (PM10) per hour and 1.88 tons of PM10 per year Visible particulate emissions (PE) shall not exceed 10 percent opacity, as a six-minute average. 13.41 pounds of volatile organic compounds (VOC) per hour and 58.74 tons of VOC per year See b)(2)a., b)(2)b., b)(2)f., and c)(1).
b.	ORC 3704.03(T)	See b)(2)c.
c.	OAC rule 3745-31-05(A)(3), as effective 11-30-01	Combustion of natural gas: 0.38 lb nitrogen oxides (NOx) per hour and 1.66 tons of NOx per year 0.32 lb carbon dioxide (CO) per hour and 1.40 tons of CO per year 0.002 lb sulfur dioxide (SO2) per hour and 0.01 ton of SO2 per year 0.03 lb volatile organic compounds (VOC) per hour and 0.14 ton of VOC per year

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		0.03 lb PM10 per hour and 0.13 ton of PM10 per year See b)(2)d.
d.	OAC rule 3745-31-05(A)(3), as effective 12-01-06	See b)(2)e.
e.	OAC rule 3745-21-09(H)	See b)(2)g.
f.	OAC rule 3745-17-11(B)	See b)(2)h.
g.	OAC rule 3745-17-07(A)	See b)(2)i.

(2) Additional Terms and Conditions

a. This permit establishes the following federally enforceable emission limitations for the purpose of limiting potential to emit (PTE). The federally enforceable emission limitations are voluntary restrictions established under OAC rule 3745-31-05(D) and are based on the operational restrictions contained in c)(1):

i. 0.43 pound of PM10/hr and 1.88 tons of PM10/yr; and

ii. Visible PE shall not exceed 10 percent opacity, as a six-minute average.

b. This permit establishes the following federally enforceable emission limitations for the purpose of representing the potential to emit of the emissions unit:

i. 13.41 lbs VOC/hr from plastic film heating; and

ii. 58.74 tons VOC/yr from plastic film heating.

c. The Best Available Technology (BAT) requirements for VOC emissions under ORC 3704.03(T) have been determined to be compliance with OAC rule 3745-21-09(H).

d. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001,in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05was revised to conform to Ohio Revised Code (ORC) changes effective August3, 2006 (Senate Bill 265 Changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S.EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, the requirements of3745-31-05(A)(3) as effective 12-1-06 will no longer apply.

e. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of the OAC rule 3745-31-05 as part of the State Implementation Plan.

The BAT requirements under OAC rule 3745-31-05(A)(3)(a), effective December 1, 2006 do not apply to the emissions of CO, NOx, SO2, or PM10 from the combustion of natural gas since the potential to emit for CO, NOx, SO2, and PM10 is less than 10 tons per year.

f. All PE is considered to be PM10.

g. The VOC content of the coatings employed in the vinyl coating line, as determined under paragraph (B) of rule OAC 3745-21-10 of the Administrative Code, shall not exceed 4.8 lbs of VOC per gallon of vinyl coating, excluding water and exempt solvents or twenty-five percent VOC by volume of the volatile matter of the vinyl coating.

h. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(D).

i. The visible emission limitation specified by this rule is less stringent than the visible emission limitation established pursuant to OAC rule 3745-31-05(D).

c) Operational Restrictions

(1) The following operational restrictions have been included in this permit for the purpose of establishing the following legally and practically enforceable requirements which limit PTE: [See b)(2)a.]

a. use of a CVM Fume Eliminator that is designed to have a 100% capture efficiency and a 90% control efficiency of PE from this emissions unit.

[OAC rule 3745-77-07(A)(1) and PTI #P0115007]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;

b. the total duration of any visible emissions incident; and

c. any corrective actions taken to eliminate the visible emissions.

[OAC rule 3745-77-07(C)(1) and PTI #P0110842]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit, and

b. describe any corrective actions taken to eliminate the visible particulate emissions.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #P0115007]

f) Testing Requirements

(1) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance withthe following requirements:

a. The emission testing shall be conducted within 3 months after issuance of the permit (following the effective date from the Title V permit) and within 6 months prior to the permit-expiration. The testing time frame specified may be amended or waived for cause upon prior request of, and written approval of, the Ohio EPA, Northwest District Office.

b. The emission testing shall be conducted to demonstrate compliance with the hourly emission limitations of PM10 and VOC and the capture and control efficiency of the control equipment.

c. The following test method(s) shall be employed to demonstrate compliance with the emission limitations: for PM10, Methods 1-4 of 40 CFR, Part 60, Appendix A, and Methods 201, 201A and 202 of 40 CFR, Part 51, Appendix M and for VOC, Methods 1-4, and 18, 25 or 25A of 40 CFR, Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

d. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR, Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

e. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or an alternative

test protocol approved by the Ohio EPA. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

f. The test(s) shall be conducted at a Maximum Source Operating Rate (MSOR), unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. MSOR is defined as the condition that is most likely to challenge the emission control measures with regards to meeting the applicable emission standard(s). Although it generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test at the MSOR is justification for not accepting the test results as a demonstration of compliance.

g. Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Northwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Northwest District Office's refusal to accept the results of the emission test(s).

h. Personnel from the Northwest District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

i. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Northwest District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Northwest District Office.

[OAC rule 3745-77-07(C)(1)]

(2) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. <u>Emission Limitations</u>:

0.43 pound of PM10 per hour and 1.88 tons of PM10 per year from plastic film heating operations

Applicable Compliance Method:

The pounds per hour emissions limitation is based on results obtained from stack testing of this source on March 5, 2013. If required, the permittee shall demonstrate compliance with the pound per hour limitation through stack testing using Methods 1-4 of 40 CFR, Part 60, Appendix A, and Methods 201, 201A and 202 of 40 CFR, Part 51, Appendix M.

The tons per year limitation was developed by multiplying the pounds per hour limitation by the maximum operating schedule of 8,760 hours/year, and dividing by 2,000 pounds per ton. Therefore, provided compliance is shown with the hourly limitation, compliance with the annual limitation shall be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI #P0115007]

b. Emission Limitations:

13.41 pounds of VOC per hour and 58.74 tons of VOC per year from plastic film heating operations

Applicable Compliance Method:

The pounds per hour emissions limitation is based on results obtained from stack testing of this source on March 5, 2013. If required, the permittee shall demonstrate compliance with the pound per hour limitation through stack testing using Methods 1-4 and 18, 25 or 25A of 40 CFR, Part 60, Appendix A.

The tons per year limitation was developed by multiplying the pounds per hour limitation by the maximum operating schedule of 8,760 hours/year, and dividing by 2,000 pounds per ton. Therefore, provided compliance is shown with the hourly limitation, compliance annual limitation shall be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI #P0115007]

c. Emission Limitations:

0.38 lbNOx per hour and 1.66 tons of NOx per year from combustion of natural gas

Applicable Compliance Method:

Compliance with the hourly limitation shall be demonstrated by multiplying the AP-42 emission factor (Section 1.4, 7/1998) of 100 pounds of NOx per million standard cubic foot (scf) by 3.78 million Btu per hour and a conversion factor of 1 scf/1,000 Btu. If required, the permittee shall demonstrate compliance with the pound per hour emission limitation by testing in accordance with Methods 1 through 4 and 7 of 40 CFR, Part 60, Appendix A.

The annual limitation was developed by multiplying the lbs/hr emission limitation by a maximum annual operating schedule of 8,760 hrs/yr and dividing by 2,000 lbs/ton. Therefore, provided compliance is shown with hourly emission limitation, compliance with the annual limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI #P0115007]

d. Emission Limitations:

0.32 lb CO per hour and 1.40 tons of CO per year from combustion of natural gas

Applicable Compliance Method:

Compliance with the hourly limitation shall be demonstrated by multiplying the AP-42 emission factor (Section 1.4, 7/1998) of 84 pounds of CO per million standard cubic foot (scf) by 3.78 million Btu per hour and a conversion factor of 1 scf/1,000 Btu. If required, the permittee shall demonstrate compliance with the pound per hour emission limitation by testing in accordance with Methods 1 through 4 and 10 of 40 CFR, Part 60, Appendix A.

The annual limitation was developed by multiplying the lbs/hr emission limitation by a maximum annual operating schedule of 8,760 hrs/yr and dividing by 2,000 lbs/ton. Therefore, provided compliance is shown with hourly emission limitation, compliance with the annual limitation shall be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI #P0115007]

e. Emission Limitations:

0.002 lb SO2 per hour and 0.01 ton of SO2 per year from the combustion of natural gas

Applicable Compliance Method:

Compliance with the hourly limitation shall be demonstrated by multiplying the AP-42 emission factor (Section 1.4, 7/1998) of 0.6 pounds of SO2 per million standard cubic foot (scf) by 3.78 million Btu per hour and a conversion factor of 1 scf/1,000 Btu. If required, the permittee shall demonstrate compliance with the pound per hour emission limitation by testing in accordance with Methods 1 through 4 and 6 of 40 CFR, Part 60, Appendix A.

The annual emission limitation was developed by multiplying the lbs/hr emission limitation by a maximum annual operating schedule of 8,760 hrs/yr, andthen dividing by 2,000 lbs/ton. Therefore, provided compliance is shown with hourly emission limitation, compliance with the annual limitation shall be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI #P0115007]

f. Emission Limitations:

0.03lb VOC per hour and 0.14 ton of VOC per year from the combustion of natural gas

Applicable Compliance Method:

Compliance with the hourly limitation shall be demonstrated by multiplying the AP-42 emission factor (Section 1.4, 7/1998) of 8.7 pounds of VOC per million standard cubic foot (scf) by 3.78 million Btu per hour and a conversion factor of 1 scf/1,000 Btu. If required, the permittee shall demonstrate compliance with the pound per hour limitation through stack testing using Methods 1-4 and 18, 25, or 25A of 40 CFR, Part 60, Appendix A.

The annual limitation was developed by multiplying the lbs/hr emission limitation by a maximum annual operating schedule of 8,760 hrs/yr, and then dividing by 2,000 lbs/ton. Therefore, provided compliance is shown with hourly emission limitation, compliance with the annual limitation shall be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI #P0115007]

g. Emission Limitations:

0.03 lb PM10 per hour and 0.13 ton of PM10 per year from the combustion of natural gas

Applicable Compliance Method:

Compliance with the hourly limitation shall be demonstrated by multiplying the AP-42 emission factor (Section 1.4, 7/1998) of 7.6 pounds of PE per million standard cubic foot (scf) by 3.78 million Btu per hour and a conversion factor of 1 scf/1,000 Btu. If required, the permittee shall demonstrate compliance with the pound per hour emission limitation by testing in accordance with Methods 1 through 4 and 40 CFR, Part 60, Appendix A and Methods 201, 201A and 202 of 40 CFR, Part 51, Appendix M.

The annual limitation was developed by multiplying the lbs/hr emission limitation by a maximum annual operating schedule of 8,760 hrs/yr, and then dividing by 2,000 lbs/ton. Therefore, provided compliance is shown with hourly emission limitation, compliance with the annual limitation shall be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI #P0115007]

h. Emission Limitation:

Visible PE shall not exceed 10 percent opacity, as a six-minute average.

Applicable Compliance Method:

If required, compliance with the visible emission limitation shall be determined in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1) and PTI #P0115007]

g) Miscellaneous Requirements

(1) None.

4. Emissions Unit Group - Laminator/Embosser: P030 and P031

EU ID	Operations, Property and/or Equipment Description
P030	Kawakami Laminator
P031	Embosser No. 5

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	ORC 3704.03(T)	See b)(2)a.
b.	OAC rule 3745-31-05(D) [PTI #P0115007 issued 9/10/13]	<u>For emissions unit P030</u>: 8.72 pounds of volatile organic compounds (VOC) per hour and 38.19 tons of VOC per year from adhesive application operations 0.09 pound of VOC per hour and 0.39 ton of VOC per year from cleanup materials <u>For emissions unit P031</u>: 3.24 pounds of VOC per hour and 14.19 tons of VOC per year from adhesive application operations 0.26 pound of VOC per hour and 1.14 tons of VOC per year from cleanup materials See b)(2)b. and c)(1).
c.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	<u>Combustion of natural gas from RTO from emissions units P030, P031, K003, and K004 combined</u> 0.54 lb nitrogen oxides (NOx) per hour and 2.37 tons of NOx per year

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		0.45 lb carbon monoxide (CO) per hour and 1.99 tons of CO per year 0.003 lb sulfur dioxide (SO2) per hour and 0.22 ton SO2 per tear 0.04 lb particulate matter less than ten microns in size (PM10) per hour and 0.18 ton of PM10 per year 0.05lb of volatile organic compounds (VOC) per hour and 0.22 ton of VOC per year Visible particulate emissions from the stack serving the RTO shall not exceed 0 percent opacity, as a six-minute average See b)(2)c.
d.	OAA rule 3745-31-05(A)(3), as effective 12/1/06	See b)(2)d.
e.	OAC rule 3745-21-09(H)	See b)(2)e.
f.	OAC rule 3745-17-11(B)	See b)(2)f.
g.	OAC rule 3745-17-07(A)	See b)(2)f.
h.	40 CFR, Part 60, Subpart FFF	See b)(2)e.
i.	40 CFR, Part 63, Subpart JJJJ [40 CFR 63.3280-3420] [In accordance with 40 CFR, 63.3300, these emissions units are web coating lines subject to the emission limitation/control measures specified in Subpart JJJJ.]	Comply with one of the following: Organic hazardous air pollutant (HAP) emissions shall be limited to no more than 5 percent of the organic HAP applied for each month (95 percent reduction) at existing affected sources; or Organic HAP emissions shall be limited to no more than 4 percent of coatings applied for the month; or organic HAP emissions shall be limited to no more than 20 percent of solids applied for the month. Outlet organic HAP concentration of no greater than 20 parts by million by volume (ppmv) by compound on a dry basis and the efficiency of the capture system is 100 percent.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
j.	40 CFR 63.1-15 [40 CFR 63.3340]	Table 2 to Subpart JJJJ of Part 63 - Applicability of 40 CFR Part 63 General Provisions to Subpart JJJJ shows which parts of the General Provisions in sections 63.1 - 63.15 of 40 CFR Part 63, Subpart A apply.
k.	40 CFR Part 64 – Compliance Assurance Monitoring (CAM)	Pursuant to 40 CFR 64.2(b), the Compliance Assurance Monitoring (CAM) requirements of 40 CFR Part 64 shall not apply to the MACT emission limitations for HAPs of 40 CFR Part 63, Subpart JJJJ specified in this permit. The VOC emission limitations in OAC rule 3745-31-05(D) shall be in compliance with the CAM requirements of 40 CFR Part 64 by complying with §§63.3321(a), 63.3350, 63.3400(c), and 63.3410 of 40 CFR Part 63, Subpart JJJJ.

(2) Additional Terms and Conditions

a. The "Best Available Technology" (BAT) requirements for VOC emissions under ORC 3704.03(T) have been determined to be the compliance with 40 CFR, Part 63, Subpart JJJJ.

b. This permit establishes the following federally enforceable emission limitations for the purpose of limiting potential to emit (PTE) to avoid Prevention of Significant Deterioration (PSD) requirements. The federally enforceable emission limitations are based on the operational restrictions contained in c)(1):

i. 8.72 pounds of VOC/hr and 38.19 tons of VOC/yr from adhesive application operations from emissions unit P030;

ii. 0.09 pound of VOC/hr and 0.39 tons of VOC/yr from cleanup materials from emissions unit P030;

iii. 3.24 pounds of VOC/hr and 14.19 tons of VOC/yr from adhesive application operations from emissions unit P031; and

iv. 0.26 pound of VOC/hr and 1.14 tons of VOC/yr from cleanup materials from emissions unit P031.

c. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001,in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05was revised to conform to Ohio Revised Code (ORC) changes effective August3, 2006 (Senate Bill 265 Changes), such that BAT is no longer required by State

regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S.EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, the requirements of3745-31-05(A)(3) as effective 12-1-06 will no longer apply.

d. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of the OAC rule 3745-31-05 as part of the State Implementation Plan.

The BAT requirements under OAC rule 3745-31-05(A)(3)(a), effective December 1, 2006 do not apply to the emissions of CO, NOx, SO2, or PM10 from the combustion of natural gas since the potential to emit for CO, NOx, SO2, and PM10 is less than 10 tons per year.

e. The requirements of this rule are less stringent than the requirements in 40 CFR, Part 63, Subpart JJJJ.

f. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3), as effective 11/30/2001.

c) Operational Restrictions

(1) The following operational restrictions have been included in this permit for the purpose of establishing federally enforceable requirements which limit potential to emit [See b)(2)b.]:

a. For VOC emissions, this emissions unit shall be vented to a RTO which achieves an overall capture efficiency of 100% and a 96% destruction efficiency.

[OAC rule 3745-77-07(A)(1) and PTI #P0115007]

(2) All of the VOC emissions from these emissions units shall be vented to the regenerative thermal oxidizer (RTO) that shall meet the operational, monitoring, and record keeping requirements of this permit, when one or more of the emissions units are in operation.

[OAC rule 3745-77-07(A)(1) and PTI #P0115007]

(3) The permanent total enclosure shall be constructed to totally enclose the emissions unit such that all volatile organic compound emission are captured, contained, and directed to the control device.

[OAC rule 3745-77-07(A)(1) and PTI #P0115007]

(4) The permanent total enclosure shall be maintained under negative pressure whenever the emissions unit is in operation, and shall be designed and maintained to have an average facial velocity of air through each natural draft opening of at least 200 feet per minute (3,600 m/hr). Compliance with the average facial velocity shall be demonstrated during the compliance test, by either using an air flow monitor or a differential pressure

gauge at each natural draft opening, and maintaining the required facial velocity or the corresponding negative pressure. The permanent total enclosure shall meet all of the following criteria if the capture efficiency of the enclosure and control device is to be assumed to be 100%:

a. Any natural draft opening shall be at least four equivalent opening diameters, or 4 times the diameter of the opening, from each VOC emitting point. An equivalent diameter is the diameter of a circle that has the same area as the opening. If the opening is not circular the equivalent diameter (ED) is calculated as follows:

$$ED = (4\ area/\pi)^{0.5}$$

b. The total area of all natural draft openings (A_N) shall not exceed 5 percent of the total surface area of the enclosure (A_T), i.e, the four walls, floor, and ceiling. The natural draft opening to enclosure area ratio (NEAR) is calculated as follows:

$$NEAR = A_N / A_T$$

c. The direction of air flow through all natural draft openings shall be into the enclosure, with an average facial velocity of no less than 200 feet per minute (3,600 m/hr) or a pressure drop of 0.013 mm Hg (0.007 in. H2O).

d. All access doors and windows to the enclosure that do not meet the requirements of a natural draft opening and whose surface areas are not included in the 5 percent surface area determination in c)(4)b, shall be completely closed to any air movement during process operations.

e. All VOC emissions shall be captured and contained for discharge through the control device.

[OAC rule 3745-77-07(A)(1) and PTI #P0115007]

(5) The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.013 mm Hg (0.007 inch of water), whenever the emissions unit is in operation.

[OAC rule 3745-77-07(A)(1) and PTI #P0115007]

(6) The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart JJJJ, including the following sections:

Subpart JJJJ section	Subpart JJJJ requirement
63.3321(a)	Requirement to meet operating limits at all times after they are established

[OAC rule 3745-77-07(A)(1), PTI #P0115007, and 40 CFR Part 63, Subpart JJJJ]

d) Monitoring and/or Recordkeeping Requirements

(1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average combustion temperature within the RTO, for any 3-hour block of time when the emissions units controlled by the RTO are in operation, must not fall below 1635 degrees Fahrenheit or below the combustion temperature limit established according to section 63.3360(e)(3)(i) of 40 CFR Part 63, Subpart JJJJ.

[OAC rule 3745-77-07(C)(1), PTI #P0115007, and 40 CFR Part 63, Subpart JJJJ]

(2) The permittee shall properly install, operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the RTO when the emissions unit is in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within ± 1 percent of the temperature being measured or ± 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee and prior approval by the Northwest District Office. The permittee shall collect and record the following information for each day the emissions units are in operation:

a. a log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit; and

b. all 3-hour blocks of time during which the average combustion temperature within the RTO, when the emissions unit was in operation, fell below 1635 degrees Fahrenheit or fell below the combustion temperature limit established according to section 63.3360(e)(3)(i) of 40 CFR Part 63, Subpart JJJJ.

[OAC rule 3745-77-07(C)(1), PTI # P0115007, and 40 CFR Part 63, Subpart JJJJ]

(3) Whenever the monitored average combustion temperature within the RTO deviates from the range/limit specified in this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range/limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that

determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was a deviation;

j. the temperature readings immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Northwest District Office. The permittee may request revisions to the permitted temperature range/limit based upon information obtained during future emission tests that demonstrate compliance with the allowable VOC emission rate for the controlled emissions unit(s). In addition, approved revisions to the temperature range/limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

[OAC rule 3745-77-07(C)(1), PTI #P0115007, and 40 CFR Part 63, Subpart JJJJ]

(4) The permittee shall measure, document/calculate, and maintain a permanent record of the following information for the permanent total enclosure, which may be the same record documented during the compliance test(s):

a. the measured diameter of each natural draft opening;

b. the distance measured from each natural draft opening to each VOC emitting point;

c. the total calculated surface area of all natural draft openings and the surface area of the enclosure's four walls, floor, and ceiling;

d. the calculation or demonstration that the distance from each VOC emitting point to each natural draft opening is at least 4 times the diameter of the opening; and

e. the calculation demonstrating that the sum of the surface areas of all of the natural draft openings to the enclosure is not more than 5 percent of the sum of the surface areas of the enclosure's four walls, floor, and ceiling.

[OAC rule 3745-77-07(C)(1) and PTI #P0115007]

(5) The permittee shall maintain and operate monitoring devices and a recorder which continuously and simultaneously measure and record the pressure inside and outside the permanent total enclosure. The monitoring and recording devices shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

[OAC rule 3745-77-07(C)(1) and PTI #P0115007]

(6) The permittee shall record and maintain on a daily basis the difference in pressure between the permanent total enclosure and the surrounding area(s) throughout the day.

[OAC rule 3745-77-07(C)(1) and PTI #P0115007]

(7) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 63, Subpart JJJJ, including the following sections:

Subpart JJJJ section	**Subpart JJJJ requirement**
63.3350(a)	Summary of monitoring required
63.3350(b)	Requirement to install and operate monitoring equipment
63.3350(e)	Requirements for continuous parameter monitoring system (CPMS)
63.3350(f)	Requirements for capture system monitoring
63.3410(a)	Recordkeeping requirements

[OAC rule 3745-77-07(C)(1), PTI #P0115007, and 40 CFR Part 63, Subpart JJJJ]

e) Reporting Requirements

(1) The permittee shall submit quarterly summaries of the following records:

a. a log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit;

b. any records of downtime (date and length of time) for the capture (collection) system, the control device, and/or the monitoring equipment when the emissions units were in operation;

c. all 3-hour blocks of time (when he emissions units were in operation) during which the permanent total enclosure was not maintained at the minimum pressure differential of 0.007 inches of water;

d. all 3-hour blocks of time (when the emissions units were in operation) during which the average combustion temperature within the RTO, when the emissions unit was in operation, fell below 1635 degrees Fahrenheit or fell below the combustion temperature limit established according to section 63.3360(e)(3)(i) of 40 CFR Part 63, Subpart JJJJ;

e. an identification of each incident of deviation described in e)(1)b. (above) where a prompt investigation was notconducted;

f. an identification of each incident of deviation described in e)(1)b. where prompt corrective action, that would bring the temperature into compliance with the acceptable range, was determined to be necessary and was not taken; and

g. an identification of each incident of deviation described in e)(1)b. where proper records were not maintained for the investigation and/or the corrective action(s).

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

[OAC rule 3745-77-07(C)(1) and PTI #P0115007]

(2) The permittee shall submit deviation (excursion) reports that identify any time periods when the emissions units were in operation and the VOC emissions were not vented to the RTO. Each report shall be submitted within 30 days after the deviation occurs.

[OAC rule 3745-77-07(C)(1) and PTI #P0115007]

(3) The permittee shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device, monitoring equipment, when the associated emissions unit was in operation.

[OAC rule 3745-77-07(C)(1) and PTI #P0115007]

(4) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. all periods of time during which the permanent total enclosure was not maintained at the required differential pressure specified in section c)(4) of the terms and conditions of this permit; and

b. all 3-hour blocks of time during which the average combustion temperature within the RTO, when the emissions unit was in operation, fell below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

[OAC rule 3745-77-07(C)(1) and PTI #P0115007]

(5) All quarterly reports shall be submitted in accordance with the Standard Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #P0115007]

(6) The permittee shall submit semiannual reports and such other notifications and reports to the appropriate Ohio EPA District Office or local air agency as are required pursuant to 40 CFR Part 63, Subpart JJJJ, per the following sections:

Subpart JJJJ section	Subpart JJJJ requirement
63.3400(a)	Requirement to submit reports
63.3400(b)	Requirement to submit initial notification
63.3400(c)	Requirement to submit semi-annual compliance reports
63.3400(d)	Requirement to submit a Notification of Performance Tests
63.3400(e)	Requirement to submit a Notification of Compliance Status
63.3400(f)	Requirement to submit performance test reports
63.3400(g)	Requirement to submit startup, shutdown, and malfunction reports

[OAC rule 3745-77-07(C)(1), PTI #P0115007, and 40 CFR Part 63, Subpart JJJJ]

f) Testing Requirements

(1) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance withthe following requirements:

a. The emission testing shall be conducted within 6 months prior to the permit expiration. The testing time frame specified may be amended or waived for cause upon prior request of, and written approval of, the Ohio EPA, Northwest District Office.

b. The emission testing shall be conducted to demonstrate compliance with the capture efficiency and control efficiency limitations, as well as the hourly emission limitations for VOC (P030 and P031).

c. The following test method(s) shall be employed to demonstrate compliance with the emission limitations: for VOC, Methods 1-4 and 18, 25 or 25A of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

d. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

e. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10, 40 CFR Part 60 Subpart JJJJ or an alternative test protocol approved by the Ohio EPA. The test methods and procedures selected shall be based on a consideration of the

diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

f. The test(s) shall be conducted at a Maximum Source Operating Rate (MSOR), unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. MSOR is defined as the condition that is most likely to challenge the emission control measures with regards to meeting the applicable emission standard(s). Although it generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test at the MSOR is justification for not accepting the test results as a demonstration of compliance.

g. Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Northwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Northwest District Office's refusal to accept the results of the emission test(s).

h. Personnel from the Northwest District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

i. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Northwest District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Northwest District Office.

[OAC rule 3745-77-07(C)(1)]

(2) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. <u>Emission Limitations:</u>

8.72 pounds of VOC per hour and 38.19 tons of VOC per year from adhesive application operations associated with emissions unit P030

<u>Applicable Compliance Method:</u>

Compliance with the hourly emission limitation shall be demonstrated by multiplying the maximum hourly rating, which was derived by dividing the maximum annual rate of 252,039 gallons coating used by 8,760 hour/year, by an

emission factor of 7.58 lbs VOC/gallon coating multiplied by a capture efficiency of 100% and a control efficiency of 96%. If required, the permittee shall demonstrate compliance with the pound per hour limitation through stack testing using Methods 1-4 and 18, 25, or 25A of 40 CFR, Part 60, Appendix A.

The tons per year limitation was developed by multiplying the pounds per hour limitation by the maximum operating schedule of 8,760 hours/year, and dividing by 2,000 pounds per ton. Therefore, provided compliance is shown with the hourly limitation, compliance with the annual limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI #P0115007]

b. Emission Limitations:

3.24 pounds of VOC per hour and 14.19 tons of VOC per year from adhesive application operations associated with emissions unit P031

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be demonstrated by multiplying the maximum hourly rating, which was derived by dividing the maximum annual rate of 113,918 gallons coating used by 8,760 hour/year, by an emission factor of 6.24lbs VOC/gallon coating multiplied by a capture efficiency of 100% and a control efficiency of 96%. If required, the permittee shall demonstrate compliance with the pound per hour limitation through stack testing using Methods 1-4 and 18, 25, or 25A of 40 CFR, Part 60, Appendix A.

The tons per year limitation was developed by multiplying the pounds per hour limitation by the maximum operating schedule of 8,760 hours/year, and dividing by 2,000 pounds per ton. Therefore, provided compliance is shown with the hourly limitation, compliance with the annual limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI #P0115007]

c. Emission Limitations:

0.09 pound of VOC per hour and 0.39 ton of VOC per year from cleanup materials from P030

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be demonstrated by multiplying the maximum hourly rating, which was derived by dividing the maximum annual rate of 2,920 gallons cleanup used by 8,760 hour/year, by an emission factor of 6.70 lbs VOC/gallon cleanup multiplied by a capture efficiency of 100% and a control efficiency of 96%. If required, the permittee shall demonstrate compliance with the pound per hour limitation through stack testing using Methods 1-4 and 18, 25, or 25A of 40 CFR, Part 60, Appendix A.

The annual limitation was developed by multiplying the lbs/hr emission limitation by a maximum annual operating schedule of 8,760 hrs/yr and dividing by 2,000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI #P0115007]

d. Emission Limitations:

0.26 pound of VOC per hour and 1.14 tons of VOC per year from cleanup materials from P031

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be demonstrated by multiplying the maximum hourly rating, which was derived by dividing the maximum annual rate of 8,575 gallons cleanup/thinners used by 8,760 hour/year, by an emission factor of 6.70 lbs VOC/gallon cleanup/thinner multiplied by a capture efficiency of 100% and a control efficiency of 96%. If required, the permittee shall demonstrate compliance with the pound per hour limitation through stack testing using Methods 1-4 and 18, 25, or 25A of 40 CFR, Part 60, Appendix A.

The annual limitation was developed by multiplying the lbs/hr emission limitation by a maximum annual operating schedule of 8,760 hrs/yr and dividing by 2,000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI #P0115007]

e. Emission Limitations:

0.54 lb of NOx per hour and 2.37 tons of NOx per year from combustion emissions from the RTO serving emissions units P030, P031, K003, and K004 combined

Applicable Compliance Method:

Compliance with the hourly limitation shall be demonstrated by multiplying the AP-42 emission factor (Section 1.4, 7/1998) of 100 pounds of NOx per million standard cubic foot (scf) by 5.4 million Btu per hour and a conversion factor of 1 scf/1000 Btu. If required, the permittee shall demonstrate compliance with the lb/MMBtu emission limitation by testing in accordance with Methods 1 through 4 and 7 of 40 CFR, Part 60, Appendix A.

The annual limitation was developed by multiplying the lbs/hr emission limitation by a maximum annual operating schedule of 8,760 hrs/yr and dividing by 2,000 lbs/ton. Therefore, provided compliance is shown with hourly emission limitation, compliance with the annual limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI #P0115007]

f. Emission Limitations:

0.45 lb of CO per hour and 1.99 tons of CO per year from combustion emissions from the RTO serving emissions units P030, P031, K003, and K004 combined

Applicable Compliance Method:

Compliance with the hourly limitation shall be demonstrated by multiplying the AP-42 emission factor (Section 1.4, 7/1998) of 84 pounds of CO per million standard cubic foot (scf) by 5.4 million Btu per hour and a conversion factor of 1 scf/1,000 Btu. If required, the permittee shall demonstrate compliance with the lb/MMBtu emission limitation by testing in accordance with Methods 1 through 4 and 10 of 40 CFR, Part 60, Appendix A.

The annual limitation was developed by multiplying the lbs/hr emission limitation by a maximum annual operating schedule of 8,760 hrs/yr and dividing by 2,000 lbs/ton. Therefore, provided compliance is shown with hourly emission limitation, compliance with the annual limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI #P0115007]

g. Emission Limitations:

0.003 lb of SO2 per hour and 0.01 ton of SO2 per year from combustion emissions from the RTO serving emissions units P030, P031, K003, and K004 combined

Applicable Compliance Method:

Compliance with the hourly limitation shall be demonstrated by multiplying the AP-42 emission factor (Section 1.4, 7/1998) of 0.6 pounds of SO2 per million standard cubic foot (scf) by 5.4 million Btu per hour and a conversion factor of 1 scf/1,000 Btu. If required, the permittee shall demonstrate compliance with the lb/MMBtu emission limitation by testing in accordance with Methods 1 through 4 and 6 of 40 CFR, Part 60, Appendix A.

The annual limitation was developed by multiplying the lbs/hr emission limitation by a maximum annual operating schedule of 8,760 hrs/yr and dividing by 2,000 lbs/ton. Therefore, provided compliance is shown with hourly emission limitation, compliance with the annual limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI #P0115007]

h. Emission Limitations:

0.04 lb of PM10 per hour and 0.18 ton of PM10 per yearfrom combustion emissions from the RTO serving emissions units P030, P031, K003, and K004 combined

Applicable Compliance Method:

Compliance with the hourly limitation shall be demonstrated by multiplying the AP-42 emission factor (Section 1.4, 7/1998) of 7.6 pounds of PE per million standard cubic foot (scf) by 5.4 million Btu per hour and a conversion factor of 1 scf/1,000 Btu. If required, the permittee shall demonstrate compliance with the pound per hour emission limitation by testing in accordance with Methods 1 through 4 and 40 CFR, Part 60, Appendix A and Methods 201, 201A and 202 of 40 CFR, Part 51, Appendix M.

The annual limitation was developed by multiplying the lbs/hr emission limitation by a maximum annual operating schedule of 8,760 hrs/yr and dividing by 2,000 lbs/ton. Therefore, provided compliance is shown with hourly emission limitation, compliance with the annual limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI #P0115007]

i. Emission Limitations:

0.05 lb of VOC per hour and 0.22 ton of VOC per yearfrom combustion emissions from the RTO serving emissions units P030, P031, K003, and K004 combined

Applicable Compliance Method:

Compliance with the hourly limitation shall be demonstrated by multiplying the AP-42 emission factor (Section 1.4, 7/1998) of 8.7 pounds of VOC per million standard cubic foot (scf) by 5.4 million Btu per hour and a conversion factor of 1 scf/1,000 Btu. If required, the permittee shall demonstrate compliance with the pound per hour limitation through stack testing using Methods 1-4 and 18, 25, or 25A of 40 CFR, Part 60, Appendix A.

The annual limitation was developed by multiplying the lbs/hr emission limitation by a maximum annual operating schedule of 8,760 hrs/yr and dividing by 2,000 lbs/ton. Therefore, provided compliance is shown with hourly emission limitation, compliance with the annual limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI #P0115007]

j. Emission Limitation:

Organic hazardous air pollutant (HAP) emissions shall be limited to no more than 5 percent of the organic HAP applied for each month (95 percent reduction) for each month at new affected sources; or

Organic HAP emissions are limited to no more than 4% of coating applied for each month; or

Organic HAP emissions are limited to no more than 20% of solids applied for each month.

Outlet organic HAP concentration of no greater than 20 parts by million by volume (ppmv) by compound on a dry basis and the efficiency of the capture system is 100 percent.

Applicable Compliance Method:

Initial compliance was demonstrated based on stack testing of theseemissions units on February 28, 2013; ongoing compliance shall be demonstrated based upon the monitoring and recordkeeping requirements in Term d)(7).

[OAC rule 3745-77-07(C)(1), PTI #P0115007, and 40 CFR Part 63, Subpart JJJJ]

k. Emission Limitation:

Visible PE shall not exceed 0% opacity, as a 6-minute average, from the RTO stack.

Applicable Compliance Method:

If required, compliance with the visible emission limitation shall be determined in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1) and PTI #P0115007]

(3) The permittee shall comply with the applicable compliance procedures and performance test methods as required under 40 CFR, 63 Subpart JJJJ, including the following sections:

Subpart JJJJ section	Subpart JJJJ requirement
63.3360(e)	Establishing control device efficiency
63.3360(f)	Establishing capture efficiency
63.3370(a)(4)	Summary of methods to demonstrate compliance using capture system and control device
63.3370(e), and (k)	Methodology to determine compliance with 63.3320(b)(1) using an oxidizer as described in (k)
63.3370(f) and (k)	Methodology to determine compliance with 63.3320(b)(3) using an oxidizer as described in (k)
63.3370(g) and (k)	Methodology to determine compliance with 63.3320(b)(2) using an oxidizer as described in (k)
63.3370(h) and (k)	Methodology to determine compliance with monthly organic HAP emission rate using an oxidizer as described in (k)

[OAC rule 3745-77-07(C)(1), PTI #P0115007, and 40 CFR Part 63, Subpart JJJJ]

g) Miscellaneous Requirements

(1) None.

5. Emissions Unit Group - Rotogravure Printers: K003 and K004

EU ID	Operations, Property and/or Equipment Description
K003	Printer No. 3
K004	Printer No. 4

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	ORC 3704.03(T)	See b)(2)a.
b.	OAC rule 3745-31-05(D) [PTI #P0115007 issued 9/10/13 for K003 and PTI #P0115512 issued 10/1/13 for K004]	<u>For emissions unit K003:</u> 7.59 lbs of volatile organic compounds (VOC) per hour and 33.24 tons of VOC per year for ink application 2.04 pounds of VOC per hour and 8.94 tons of VOC per year from cleanup materials <u>For emissions unit K004:</u> 5.59 lbs of volatile organic compounds (VOC) per hour and 24.48 tons of VOC per year for coating and cleanup materials 1.17 pounds of VOC per hour and 5.12 tons of VOC per year from cleanup materials See b)(2)b. and c)(1).
c.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	<u>Combustion of natural gas from RTO from emissions units P030, P031, K003, and K004 combined</u>: 0.54 lb of nitrogen oxides (NOx) per hour

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		and 2.37 tons of NOx per year 0.45 lb of carbon monoxide (CO) per hour and 1.99 tons of CO per year 0.003 lb of sulfur dioxide (SO2) per hour and 0.01 ton of SO2 per year 0.04 lb of particulate matter less than ten microns in size (PM10) and 0.18 ton of PM10 per year 0.05lb of VOC per hour and 0.22 ton of VOC per year Visible particulate emissions from the stack serving the RTO shall not exceed 0 percent opacity, as a six-minute average See b)(2)c.
d.	OAC rule 3745-31-05(A)(3), as effective 12/1/06	See b)(2)d.
e.	OAC rule 3745-21-09(H)	See b)(2)e.
f.	OAC rule 3745-17-11(B)	See b)(2)f.
g.	OAC rule 3745-17-07(A)	See b)(2)f.
h.	40 CFR Part 60 Subpart FFF	See b)(2)e.
i.	40 CFR, Part 63, Subpart JJJJ [40 CFR 63.3280-3420] [In accordance with 40 CFR, 63.3300, these emissions units are web coating lines subject to the emission limitation/control measures specified in Subpart JJJJ.]	Comply with one of the following limits: Organic hazardous air pollutant (HAP) emissions shall be limited to no more than 5 percent of the organic HAP applied for each month (95 percent reduction) at existing affected sources; or Organic HAP emissions shall be limited to no more than 4% of coatings applied for the month; or Organic HAP emissions shall be limited to no more than 20% of solids applied for the month; or Operate the oxidizer such that an outlet organic HAP concentration of no greater than 20 parts per million by volume (ppmv) by compound on a dry basis is achieved and the efficiency of the capture

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		system is 100 percent.
j.	40 CFR 63.1-15 [40 CFR 63.3340]	Table 2 to Subpart JJJJ of Part 63 - Applicability of 40 CFR Part 63 General Provisions to Subpart JJJJ shows which parts of the General Provisions in sections 63.1 - 63.15 of 40 CFR Part 63, Subpart A apply.
k.	40 CFR Part 64 – Compliance Assurance Monitoring (CAM)	Pursuant to 40 CFR 64.2(b), the Compliance Assurance Monitoring (CAM) requirements of 40 CFR Part 64 shall not apply to the MACT emission limitations for HAPs of 40 CFR Part 63, Subpart JJJJ specified in this permit. The VOC emission limitations in OAC rule 3745-31-05(D) shall be in compliance with the CAM requirements of 40 CFR Part 64 by complying with §§63.3321(a), 63.3350, 63.3400(c), and 63.3410 of 40 CFR Part 63, Subpart JJJJ.

(2) Additional Terms and Conditions

a. The "Best Available Technology" (BAT) requirements for VOC emissions under ORC 3704.03(T) have been determined to be the compliance with 40 CFR, Part 63, Subpart JJJJ.

b. This permit establishes the following federally enforceable emission limitations for the purpose of limiting potential to emit (PTE) to avoid Prevention of Significant Deterioration (PSD) requirements. The federally enforceable emission limitations are based on the operational restrictions contained in c)(1):

i. 7.59 pounds of VOC/hr and 33.24 tons of VOC/yr for coating from emissions unit K003;

ii. 2.04 pounds of VOC/hr and 8.94 tons of VOC/yr for cleanup materials from emissions unit K003;

iii. 5.59 pounds of VOC/hr and 24.48 tons of VOC/yr for coating from emissions unit K004; and

iv. 1.17 pounds of VOC/hr and 5.12 tons of VOC/yr for cleanup materials from emissions unit K004.

c. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001,in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05was

revised to conform to Ohio Revised Code (ORC) changes effective August3, 2006 (Senate Bill 265 Changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S.EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, the requirements of3745-31-05(A)(3) as effective 12-1-06 will no longer apply.

d. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of the OAC rule 3745-31-05 as part of the State Implementation Plan.

The BAT requirements under OAC rule 3745-31-05(A)(3)(a), effective December 1, 2006 do not apply to the emissions of CO, NOx, SO2,or PM10 from the combustion of natural gas since the potential to emit for CO, NOx, SO2, and PM10 is less than 10 tons per year.

e. The requirements of this rule are less stringent than the requirements in 40 CFR, Part 63, Subpart JJJJ for Paper and other Web Coating.

f. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

c) Operational Restrictions

(1) The following operational restrictions have been included in this permit for the purpose of establishing federally enforceable requirements which limit potential to emit [See b)(2)b.]:

a. For VOC emissions, this emissions unit shall be vented to a RTO which achieves an overall capture efficiency of 100% and a 96% destruction efficiency.

[OAC rule 3745-77-07(A)(1), PTI #P0115007, and PTI #P0115512]

(2) All of the VOC emissions from these emissions units shall be vented to the regenerative thermal oxidizer (RTO) that shall meet the operational, monitoring, and record keeping requirements of this permit, when one or more of the emissions units are in operation.

[OAC rule 3745-77-07(A)(1), PTI #P0115007, and PTI #P0115512]

(3) The permanent total enclosure shall be constructed to totally enclose the emissions unit such that all volatile organic compound emission are captured, contained, and directed to the control device.

[OAC rule 3745-77-07(A)(1), PTI #P0115007, and PTI #P0115512]

(4) The permanent total enclosure shall be maintained under negative pressure whenever the emissions unit is in operation, and shall be designed and maintained to have an average facial velocity of air through each natural draft opening of at least 200 feet per minute (3,600 m/hr). Compliance with the average facial velocity shall be demonstrated

during the compliance test, by either using an air flow monitor or a differential pressure gauge at each natural draft opening, and maintaining the required facial velocity or the corresponding negative pressure. The permanent total enclosure shall meet all of the following criteria if the capture efficiency of the enclosure and control device is to be assumed to be 100%:

a. Any natural draft opening shall be at least four equivalent opening diameters, or 4 times the diameter of the opening, from each VOC emitting point. An equivalent diameter is the diameter of a circle that has the same area as the opening. If the opening is not circular the equivalent diameter (ED) is calculated as follows:

$$ED = (4\ area/\pi)^{0.5}$$

b. The total area of all natural draft openings (A_N) shall not exceed 5 percent of the total surface area of the enclosure (A_T), i.e, the four walls, floor, and ceiling. The natural draft opening to enclosure area ratio (NEAR) is calculated as follows:

$$NEAR = A_N / A_T$$

c. The direction of air flow through all natural draft openings shall be into the enclosure, with an average facial velocity of no less than 200 feet per minute (3,600 m/hr) or a pressure drop of 0.013 mm Hg (0.007 in. H2O).

d. All access doors and windows to the enclosure that do not meet the requirements of a natural draft opening and whose surface areas are not included in the 5 percent surface area determination in c)(4)b., shall be completely closed to any air movement during process operations.

e. All VOC emissions shall be captured and contained for discharge through the control device.

[OAC rule 3745-77-07(A)(1), PTI #P0115007, and PTI #P0115512]

(5) The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.013 mm Hg (0.007 inch of water), whenever the emissions unit is in operation.

[OAC rule 3745-77-07(A)(1), PTI #P0115007, and PTI #P0115512]

(6) The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart JJJJ, including the following sections:

Subpart JJJJ section	Subpart JJJJ requirement
63.3321(a)	Requirement to meet operating limits at all times after they are established

[OAC rule 3745-77-07(A)(1), PTI #P0115007, PTI #P0115512, and 40 CFR Part 63, Subpart JJJJ]

d) Monitoring and/or Recordkeeping Requirements

(1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average combustion temperature within the RTO, for any 3-hour block of time when the emissions units controlled by the RTO are in operation, must not fall below 1635 degrees Fahrenheit or below the combustion temperature limit established according to section 63.3360(e)(3)(i) of 40 CFR Part 63, Subpart JJJJ.

[OAC rule 3745-77-07(C)(1), PTI #P0115007, PTI #P0115512, and 40 CFR Part 63, Subpart JJJJ]

(2) The permittee shall properly install, operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the RTO when the emissions unit is in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within ± 1 percent of the temperature being measured or ± 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee and prior approval by the Northwest District Office. The permittee shall collect and record the following information for each day the emissions units are in operation:

a. a log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit; and

b. all 3-hour blocks of time during which the average combustion temperature within the RTO, when the emissions unit was in operation, fell below 1635 degrees Fahrenheit or fell below the combustion temperature limit established according to section 63.3360(e)(3)(i) of 40 CFR Part 63, Subpart JJJJ.

[OAC rule 3745-77-07(C)(1), PTI #P0115007, PTI # P0115512, and 40 CFR Part 63, Subpart JJJJ]

(3) Whenever the monitored average combustion temperature within the RTO deviates from the range/limit specified in this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control

equipment within the acceptable range/limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was a deviation;

j. the temperature readings immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Northwest District Office. The permittee may request revisions to the permitted temperature range/limit based upon information obtained during future emission tests that demonstrate compliance with the allowable VOC emission rate for the controlled emissions unit(s). In addition, approved revisions to the temperature range/limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

[OAC rule 3745-77-07(C)(1), PTI #P0115007, and PTI #P0115512]

(4) The permittee shall measure, document/calculate, and maintain a permanent record of the following information for the permanent total enclosure, which may be the same record documented during the compliance test(s):

a. the measured diameter of each natural draft opening;

b. the distance measured from each natural draft opening to each VOC emitting point;

c. the total calculated surface area of all natural draft openings and the surface area of the enclosure's four walls, floor, and ceiling;

d. the calculation or demonstration that the distance from each VOC emitting point to each natural draft opening is at least 4 times the diameter of the opening; and

e. the calculation demonstrating that the sum of the surface areas of all of the natural draft openings to the enclosure is not more than 5 percent of the sum of the surface areas of the enclosure's four walls, floor, and ceiling.

[OAC rule 3745-77-07(C)(1), PTI #P0115007, and PTI #P0115512]

(5) The permittee shall maintain and operate monitoring devices and a recorder which continuously and simultaneously measure and record the pressure inside and outside the permanent total enclosure. The monitoring and recording devices shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

[OAC rule 3745-77-07(C)(1), PTI #P0115007, and PTI #P0115512]

(6) The permittee shall record and maintain on a daily basis the difference in pressure between the permanent total enclosure and the surrounding area(s) throughout the day.

[OAC rule 3745-77-07(C)(1), PTI #P0115007, and PTI #P0115512]

(7) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 63, Subpart JJJJ, including the following sections:

Subpart JJJJ section	**Subpart JJJJ requirement**
63.3350(a)	Summary of monitoring required
63.3350(b)	Requirement to install and operate monitoring equipment
63.3350(e)	Requirements for continuous parameter monitoring system (CPMS)
63.3350(f)	Requirements for capture system monitoring
63.3410(a)	Recordkeeping requirements

[OAC rule 3745-77-07(C)(1), PTI #P0115007, and PTI #P0115512]

e) Reporting Requirements

(1) The permittee shall submit quarterly summaries of the following records:

a. a log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit;

b. any records of downtime (date and length of time) for the capture (collection) system, the control device, and/or the monitoring equipment when the emissions units were in operation;

c. all 3-hour blocks of time (when he emissions units were in operation) during which the permanent total enclosure was not maintained at the minimum pressure differential of 0.007 inches of water;

d. all 3-hour blocks of time (when the emissions units were in operation) during which the average combustion temperature within the RTO, when the emissions unit was in operation, fell below 1635 degrees Fahrenheit or fell below the combustion temperature limit established according to section 63.3360(e)(3)(i) of 40 CFR Part 63, Subpart JJJJ;

e. an identification of each incident of deviation described in e)(1)b. (above) where a prompt investigation was notconducted;

f. an identification of each incident of deviation described in e)(1)b. where prompt corrective action, that would bring the temperature into compliance with the acceptable range, was determined to be necessary and was not taken; and

g. an identification of each incident of deviation described in e)(1)b. where proper records were not maintained for the investigation and/or the corrective action(s).

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

[OAC rule 3745-77-07(C)(1), PTI #P0115007, and PTI #P0115512]

(2) The permittee shall submit deviation (excursion) reports that identify any time periods when the emissions units were in operation and the VOC emissions were not vented to the RTO. Each report shall be submitted within 30 days after the deviation occurs.

[OAC rule 3745-77-07(C)(1), PTI #P0115007, and PTI #P0115512]

(3) The permittee shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device, monitoring equipment, when the associated emissions unit was in operation.

[OAC rule 3745-77-07(C)(1), PTI #P0115007, and PTI #P0115512]

(4) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. all periods of time during which the permanent total enclosure was not maintained at the required differential pressure specified in section c)(4) of the terms and conditions of this permit; and

b. all 3-hour blocks of time during which the average combustion temperature within the RTO, when the emissions unit was in operation, fell below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

[OAC rule 3745-77-07(C)(1), PTI #P0115007, and PTI #P0115512]

(5) All quarterly reports shall be submitted in accordance with the Standard Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1), PTI #P0115007, and PTI #P0115512]

(6) The permittee shall submit semiannual reports and such other notifications and reports to the appropriate Ohio EPA District Office or local air agency as are required pursuant to 40 CFR Part 63, Subpart JJJJ, per the following sections:

Subpart JJJJ section	Subpart JJJJ requirement
63.3400(a)	Requirement to submit reports
63.3400(b)	Requirement to submit initial notification
63.3400(c)	Requirement to submit semi-annual compliance reports
63.3400(d)	Requirement to submit a Notification of Performance Tests
63.3400(e)	Requirement to submit a Notification of Compliance Status
63.3400(f)	Requirement to submit performance test reports
63.3400(g)	Requirement to submit startup, shutdown, and malfunction reports

[OAC rule 3745-77-07(C)(1), PTI #P0115007, PTI #P0115512, and 40 CFR Part 63, Subpart JJJJ]

f) Testing Requirements

(1) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance withthe following requirements:

a. The emission testing shall be conducted within 6 months prior to the permit expiration. The testing time frame specified may be amended or waived for cause upon prior request of, and written approval of, the Ohio EPA, Northwest District Office.

b. The emission testing shall be conducted to demonstrate compliance with the capture efficiency and control efficiency limitations, as well as the hourly emission limitations for VOC (K003 and K004).

c. The following test method(s) shall be employed to demonstrate compliance with the emission limitations: for VOC, Methods 1-4 and 18, 25 or 25A of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

d. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

e. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10, 40 CFR Part 60 Subpart JJJJ or an alternative test protocol approved by the Ohio EPA. The test methods and procedures selected shall be based on a consideration of the

diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

f. The test(s) shall be conducted at a Maximum Source Operating Rate (MSOR), unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. MSOR is defined as the condition that is most likely to challenge the emission control measures with regards to meeting the applicable emission standard(s). Although it generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test at the MSOR is justification for not accepting the test results as a demonstration of compliance.

g. Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Northwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Northwest District Office's refusal to accept the results of the emission test(s).

h. Personnel from the Northwest District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

i. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Northwest District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Northwest District Office.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart JJJJ]

(2) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. <u>Emission Limitations:</u>

7.59 pounds of VOC per hour and 33.24 tons of VOC per year from ink application operations associated with emissions unit K003

<u>Applicable Compliance Method:</u>

Compliance with the hourly emission limitation shall be demonstrated by multiplying the maximum hourly rating, which was derived by dividing the maximum annual rate of 230,026 gallons coating used by 8,760 hour/year, by an

emission factor of 7.23 lbs VOC/gallon coating multiplied by a capture efficiency of 100% and a control efficiency of 96%. If required, the permittee shall demonstrate compliance with the pound per hour limitation through stack testing using Methods 1-4 and 18, 25, or 25A of 40 CFR, Part 60, Appendix A.

The tons per year limitation was developed by multiplying the pounds per hour limitation by the maximum operating schedule of 8,760 hours/year, and dividing by 2,000 pounds per ton. Therefore, provided compliance is shown with the hourly limitation, compliance with the annual limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI #P0115007]

b. Emission Limitations:

5.59 pounds of VOC per hour and 24.48 tons of VOC per year from ink application operations associated with emissions unit K004

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be demonstrated by multiplying the maximum hourly rating, which was derived by dividing the maximum annual rate of 174,279 gallons coating used by 8,760 hour/year, by an emission factor of 7.02 lbs VOC/gallon coating multiplied by a capture efficiency of 100% and a control efficiency of 96%. If required, the permittee shall demonstrate compliance with the pound per hour limitation through stack testing using Methods 1-4 and 18, 25, or 25A of 40 CFR, Part 60, Appendix A.

The tons per year limitation was developed by multiplying the pounds per hour limitation by the maximum operating schedule of 8,760 hours/year, and dividing by 2,000 pounds per ton. Therefore, provided compliance is shown with the hourly limitation, compliance with the annual limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI #P0115512]

c. Emission Limitations:

2.04 pounds of VOC per hour and 8.94 tons of VOC per year from cleanup materials from K003

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be demonstrated by multiplying the maximum hourly rating, which was derived by dividing the maximum annual rate of 6,623 gallons cleanup/thinner used by 8,760 hour/year, by an emission factor of 6.70 lbs VOC/gallon cleanup multiplied by a capture efficiency of 100% and a control efficiency of 96%.If required, the permittee shall demonstrate compliance with the pound per hour limitation through stack testing using Methods 1-4 and 18, 25, or 25A of 40 CFR, Part 60, Appendix A.

The annual limitation was developed by multiplying the lbs/hr emission limitation by a maximum annual operating schedule of 8,760 hrs/yr and dividing by 2,000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI #P0115007]

d. Emission Limitations:

1.17 pounds of VOC per hour and 5.12 tons of VOC per year from cleanup materials from K004.

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be demonstrated by multiplying the maximum hourly rating, which was derived by dividing the maximum annual rate of 38,195 gallons cleanup/thinners used by 8,760 hour/year, by an emission factor of 6.70 lbs VOC/gallon cleanup/thinner multiplied by a capture efficiency of 100% and a control efficiency of 96%.If required, the permittee shall demonstrate compliance with the pound per hour limitation through stack testing using Methods 1-4 and 18, 25, or 25A of 40 CFR, Part 60, Appendix A.

The annual limitation was developed by multiplying the lbs/hr emission limitation by a maximum annual operating schedule of 8,760 hrs/yr and dividing by 2,000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI #P0115512]

e. Emission Limitation:

Organic hazardous air pollutant (HAP) emissions shall be limited to no more than 5 percent of the organic HAP applied for each month (95 percent reduction) at existing affected sources; or

Organic HAP emissions shall be limited to no more than 4% of coatings applied for the month; or

Organic HAP emissions shall be limited to no more than 20% of solids applied for the month; or

Operate the oxidizer such that an outlet organic HAP concentration of no greater than 20 parts per million by volume (ppmv) by compound on a dry basis is achieved and the efficiency of the capture system is 100 percent.

Applicable Compliance Method:

Initial compliance was demonstrated based on stack testing of theseemissions units on February 28, 2013; ongoing compliance shall be demonstrated based upon the monitoring and recordkeeping requirements in Term d)(7).

[OAC rule 3745-77-07(C)(1), PTI #P0115007, and PTI #P0115512]

f. Emission Limitations:

0.54 lb of NOx per hour and 2.37 tons of NOx per year from combustion emissions from the RTO serving emission units P030, P031, K003, and K004 combined

Applicable Compliance Method:

Compliance with the hourly limitation shall be demonstrated by multiplying the AP-42 emission factor (Section 1.4, 7/1998) of 100 pounds of NOx per million standard cubic foot (scf) by 5.4 million Btu per hour and a conversion factor of 1 scf/1,000 Btu. If required, the permittee shall demonstrate compliance with the lb/MMBtu emission limitation by testing in accordance with Methods 1 through 4 and 7 of 40 CFR, Part 60, Appendix A.

The annual limitation was developed by multiplying the lbs/hr emission limitation by a maximum annual operating schedule of 8,760 hrs/yr and dividing by 2,000 lbs/ton. Therefore, provided compliance is shown with hourly emission limitation, compliance with the annual limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1), PTI #P0115007, and PTI #P0115512]

g. Emission Limitations:

0.45 lb of CO per hour and 1.99 tons of CO per year from combustion emissions from the RTO serving emission units P030, P031, K003, and K004 combined

Applicable Compliance Method:

Compliance with the hourly limitation shall be demonstrated by multiplying the AP-42 emission factor (Section 1.4, 7/1998) of 84 pounds of CO per million standard cubic foot (scf) by 5.4 million Btu per hour and a conversion factor of 1 scf/1,000 Btu. If required, the permittee shall demonstrate compliance with the lb/MMBtu emission limitation by testing in accordance with Methods 1 through 4 and 10 of 40 CFR, Part 60, Appendix A.

The annual limitation was developed by multiplying the lbs/hr emission limitation by a maximum annual operating schedule of 8,760 hrs/yr and dividing by 2,000 lbs/ton. Therefore, provided compliance is shown with hourly emission limitation, compliance with the annual limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1), PTI #P0115007, and PTI #P0115512]

h. Emission Limitations:

0.003 lb of SO2 per hour and 0.01 ton of SO2 per yearfrom combustion emissions from the RTO serving emissions units P030, P031, K003, and K004 combined

Applicable Compliance Method:

Compliance with the hourly limitation shall be demonstrated by multiplying the AP-42 emission factor (Section 1.4, 7/1998) of 0.6 pounds of SO2 per million standard cubic foot (scf) by 5.4 million Btu per hour and a conversion factor of 1 scf/1,000 Btu. If required, the permittee shall demonstrate compliance with the lb/MMBtu emission limitation by testing in accordance with Methods 1 through 4 and 6 of 40 CFR, Part 60, Appendix A.

The annual limitation was developed by multiplying the lbs/hr emission limitation by a maximum annual operating schedule of 8,760 hrs/yr and dividing by 2,000 lbs/ton. Therefore, provided compliance is shown with hourly emission limitation, compliance with the annual limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1), PTI #P0115007, PTI #P0115512]

i. Emission Limitations:

0.04 lb of PM10 per hour and 0.18 ton of PM10 per year from combustion emissions from the RTO serving emission units P030, P031, K003 and K004 combined

Applicable Compliance Method:

Compliance with the hourly limitation shall be demonstrated by multiplying the AP-42 emission factor (Section 1.4, 7/1998) of 7.6 pounds of PE per million standard cubic foot (scf) by 5.4 million Btu per hour and a conversion factor of 1 scf/1,000 Btu. If required, the permittee shall demonstrate compliance with the pound per hour emission limitation by testing in accordance with Methods 1 through 4 and 40 CFR, Part 60, Appendix A and Methods 201, 201A and 202 of 40 CFR, Part 51, Appendix M.

The annual limitation was developed by multiplying the lbs/hr emission limitation by a maximum annual operating schedule of 8,760 hrs/yr and dividing by 2,000 lbs/ton. Therefore, provided compliance is shown with hourly emission limitation, compliance with the annual limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1), PTI #P0115007, and PTI #P0115512]

j. Emission Limitations:

0.05 lb of VOC per hour and 0.22 ton of VOC per year from combustion emissions from the RTO serving emission units P030, P031, K003 and K004 combined

Applicable Compliance Method:

Compliance with the hourly limitation shall be demonstrated by multiplying the AP-42 emission factor (Section 1.4, 7/1998) of 8.7 pounds of VOC per million standard cubic foot (scf) by 5.4 million Btu per hour and a conversion factor of 1 scf/1,000 Btu. If required, the permittee shall demonstrate compliance with the

pound per hour limitation through stack testing using Methods 1-4 and 18, 25, or 25A of 40 CFR, Part 60, Appendix A.

The annual limitation was developed by multiplying the lbs/hr emission limitation by a maximum annual operating schedule of 8,760 hrs/yr and dividing by 2,000 lbs/ton. Therefore, provided compliance is shown with hourly emission limitation, compliance with the annual limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1), PTI #P0115007, and PTI #P0115512]

k. Emission Limitation:

Visible PE shall not exceed 0% opacity, as a 6-minute average, from the RTO stack.

Applicable Compliance Method:

If required, compliance with the visible emission limitation shall be determined in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1),PTI #P0115007, and PTI #P0115512]

(3) The permittee shall comply with the applicable compliance procedures and performance test methods as required under 40 CFR, 63 Subpart JJJJ, including the following sections:

Subpart JJJJ section	Subpart JJJJ requirement
63.3360(e)	Establishing control device efficiency
63.3360(f)	Establishing capture efficiency
63.3370(a)(4)	Summary of methods to demonstrate compliance using capture system and control device
63.3370(e), and (k)	Methodology to determine compliance with 63.3320(b)(1) using an oxidizer as described in (k)
63.3370(f) and (k)	Methodology to determine compliance with 63.3320(b)(3) using an oxidizer as described in (k)
63.3370(g) and (k)	Methodology to determine compliance with 63.3320(b)(2) using an oxidizer as described in (k)
63.3370(h) and (k)	Methodology to determine compliance with monthly organic HAP emission rate using an oxidizer as described in (k)

[OAC rule 3745-77-07(C)(1), PTI #P0115007, PTI #P0115512, and 40 CFR Part 63, Subpart JJJJ]

g) Miscellaneous Requirements

(1) None.